

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE  
LITIGATION

MDL No. 2804

*This Document Relates to:*

CASE NO: 1:17-md-2804

*All Cases Noted on Attached Exhibit*

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND ORDER DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO THE CORRECTED ENDO/PAR TEXAS STATE-WIDE OPIOID  
SETTLEMENT AGREEMENT AND SETTLEMENT TERM SHEET**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Exhibit A (collectively, “Dismissing Plaintiffs”), and Defendants Endo Health Solutions Inc., Endo Pharmaceuticals Inc., Endo International plc, Par Pharmaceutical, Inc., and Par Pharmaceutical Companies, Inc. (collectively, “Endo and Par Defendants”<sup>1</sup>), that pursuant to the election of each Dismissing Plaintiff to participate in the Corrected Endo/Par Texas State-Wide Opioid Settlement Agreement and Settlement Term Sheet dated January 7, 2022 and attached hereto as Exhibit B, all claims of each Dismissing Plaintiff against any Endo or Par Defendant are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

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<sup>1</sup> The Corrected Endo/Par Texas State-Wide Opioid Settlement Agreement and Settlement Term Sheet (the “Endo/Par Agreement”) provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which include not only the Endo and Par Defendants but also other related individuals and entities. Endo/Par Agreement §II.T and Ex. A (attached as Exhibit B). To the extent the parties discover that any Released Claim of any Dismissing Plaintiffs remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

Date: July 1, 2022

Respectfully submitted,

/s/ Jeffrey B. Simon

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*On behalf of the Court-Appointed Plaintiffs' Steering Committee, Chair*

/s/ Shelly Sanford

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*On behalf of the Court-Appointed State-Federal Liaison Counsel*

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*/s/ John H. Beisner*

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*Attorneys for Defendants Endo Health  
Solutions Inc., Endo Pharmaceuticals  
Inc., Par Pharmaceutical, Inc. and Par  
Pharmaceutical Companies, Inc.*

SO ORDERED this \_\_\_\_ Day of \_\_\_\_, 2022.

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Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

*/s/Jeffrey B. Simon*  
Jeffrey B. Simon